

State of Texas §
 §
County of Travis §

BEFORE ME, the undersigned personally appeared Jennifer Anne Hall who, swore the following:

1. My name is Jennifer Anne Hall. I am over 18 years of age, of sound mind, and competent to make this affidavit. I have personal knowledge of the facts stated herein, and they are true and correct.

2. I am resident of Texas and Tarrant County.

3. I am the Organization Assistant for The Republican Party of Texas. .

4. We are committed to advancing limited government, lower taxes, less spending and individual liberty. Our specific goals are to grow the Republican Party by reaching new voters, advance the Platform, which is grounded in conservative principle, and to keep Texas prosperous and free. The Republican Party of Texas serves:

To promote a conservative philosophy of government:

By promoting conservative principles; and

By providing the infrastructure through which those who share our conservative principles can get involved in the political process, run for and be elected to public office, and govern according to our principles when elected.

5. Chris Hollins currently serves as the County Clerk of Harris County, Texas. Under the Texas Election Code, Mr. Hollins serves as the Early Voting Clerk for Harris County and is responsible for administering curbside voting in compliance with Sections 64.009, 83.002 and 104.001-104.005 of the Texas Election Code, for both Early Voting and Election Day Voting. This Petition for Writ of Mandamus names Mr. Hollins as the Respondent.

6. On September 10, 2020, Chris Hollins held a press conference to announce his office's implementation of a countywide "drive-thru" voting program for every registered voter in Harris County. The Texas Election Code does not use the term "drive-thru" voting. Rather, the term "curbside" voting is used instead. It is clear, however, that Respondent Hollins is using these terms interchangeably.

7. I have personally watched and listened to the press conference. I can personally swear that a true and correct transcription of what Respondent Hollins said in a 33 second segment of that press conference appears verbatim below in Paragraph 8. Beginning at the 4-minute mark of his press conference, and continuing on to 4:33, Respondent Hollins said the following:

8. "Drive-thru voting is an option for all voters who would like to be able to vote from the safety and comfort of your vehicle. Drive-thru voting allows those who don't qualify to vote by mail to minimize your exposure to other voters and to election workers. While we hope to have short lines across the county, drive-

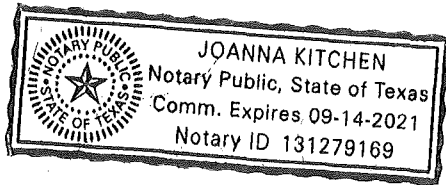
thru voters waiting in line will be able to wait in the comfort of your vehicle where you can listen to the radio or converse with loved ones until you are pointed to your drive-thru voting booth. We hope that Harris County voters will consider utilizing drive-thru voting.”

9. In addition to Respondent Hollins’ press conference, he also released a video on YouTube, which is also posted on the Harris County Clerk’s Office website, just this past Friday, October 9, 2020. This video is entitled “Drive-Thru Voting in five steps.” Nowhere in this demonstrative video of a voter voting curbside in his vehicle is there any discussion or caution or depiction about how a voter may determine his or her eligibility to vote curbside. Nor is there any mention or depiction that a voter desiring to vote curbside must fill out a sworn application to vote curbside. To the contrary, the clear impression of this video is that anyone and everyone may vote curbside in Harris County should they wish to do so. Finally, the video depicts curbside voting taking place outside of a polling location and that polling location is not inside of a building. Because Respondent Hollins is clearly requesting Harris County registered voters to vote curbside without regard to whether they are eligible to vote curbside, and because of the very clear threat of imminent harm which will result from ineligible curbside voting taking place in violation of the Texas Election Code, Relator RPT brings this Mandamus Petition to mandate compliance by the Respondent with his clear and non-discretionary ministerial duties.

SIGNED this 12th day of October 2020.

Jennifer Wall

SUBSCRIBED and SWORN TO before me, the undersigned authority, on the 12th day of October, 2020.



J. Kitchen
Notary in and for the State of Texas